



# MEMO ENDORSED

December 5, 2023

**VIA ECF**

Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 435  
New York, NY 10007

Re: *Torres v. Estee Lauder Companies, et al.*, No. 1:23-cv-08875-ALC

Dear Judge Carter:

This firm represents Defendant Randstad US, LLC (erroneously named as “Randstad USA” (“Randstad”) in the above-referenced action. We write pursuant to Your Honor’s Individual Practices to respectfully request a stay of the above-referenced action pending arbitration of Plaintiff’s claims. As background, Plaintiff signed an arbitration agreement with Randstad during her onboarding with the company, which requires arbitration of the claims asserted in her complaint. That agreement also identifies Defendant Estee Lauder Companies as an intended third-party beneficiary. After conferral, Plaintiff has agreed to assert her claims in arbitration before the American Arbitration Association, and all parties consent to a stay of this action until the arbitration proceeding is complete.

Accordingly, Randstad requests a stay of this action, including the deadlines for Defendants to answer the complaint, pending the outcome of the arbitration. Randstad will promptly alert the Court when the arbitrator has issued the final award. We thank the Court for its attention and consideration to this request.

Dated: December 5, 2023

Respectfully submitted,

/s/ Michael D. Kabat  
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cc: All Counsel of Record (via ECF)  
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SO ORDERED:  
Hon. Andrew L. Carter, Jr.  
United States District Judge

April 2, 2024  
New York, New York